

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT,  
L.P.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 19-34054-sgj11

Rel. Dkt. Nos. 205, 336

**SECOND SUPPLEMENTAL DECLARATION OF CONOR P. TULLY  
IN SUPPORT OF THE APPLICATION AUTHORIZING THE EMPLOYMENT  
AND RETENTION OF FTI CONSULTING, INC. AS FINANCIAL ADVISOR TO  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
NUNC PRO TUNC TO NOVEMBER 6, 2019**

Pursuant to 28 USC Section 1746, Conor P. Tully declares as follows:

1. I am a Senior Managing Director with FTI Consulting, Inc., together with its wholly owned subsidiaries (“FTI”), an international consulting firm. I submit this declaration (the “Second Supplemental Declaration”) to supplement my prior declaration (the “Original Declaration”) that was submitted in connection with FTI’s retention by the Official Committee of Unsecured Creditors (the “Committee”) of Highland Capital Management, L.P., the debtor and debtor-in-possession in the above-captioned chapter 11 case (the “Debtor”). Unless otherwise noted, I have personal knowledge of the facts set forth herein.

2. On October 16, 2019, the Debtor commenced this case by filing a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code.

3. On December 6, 2019, the Committee filed an application to retain FTI as its Financial Advisor (the “Application”). In support of the Application, FTI filed the Original

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<sup>1</sup> The Debtor’s last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

Declaration executed by the undersigned on behalf of FTI in accordance with the applicable sections of the Bankruptcy Code. On January 9, 2020, an order was entered authorizing the retention of FTI as financial advisor to the Committee (the “Retention Order”) [Dkt. No. 336].

4. As noted in the Application, FTI’s hourly rates are subject to periodic adjustment.

Effective January 1, 2021, such hourly rate ranges are as follows:

	<u>Per Hour (USD)</u>
Senior Managing Directors	\$785 - 1,295
Directors / Senior Directors / Managing Directors	550 - 935
Consultants/Senior Consultants	335 - 680
Administrative / Paraprofessionals	155 - 290

These rates continue to be subject to periodic adjustment.

*[Remainder of page intentionally left blank]*

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14<sup>th</sup> day of January 2021

FTI CONSULTING, INC.  
Financial Advisors to the Official Committee of  
Unsecured Creditors of Highland Capital Management,  
L.P.

By: /s/ *Conor P. Tully*  
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